

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DENNESS R. ELLIS,)
)
Plaintiff,)
)
v.) CASE NO. 2:06-CV-00421-WKW
)
LIBERTY MUTUAL FIRE INSURANCE)
COMPANY, et al.,)
)
Defendants.)

JOINT MOTION TO REMAND

Come now the parties of record and file this joint motion to remand for the reasons set forth below:

1. The parties have attached a Joint Stipulation of Facts outlining the relevant facts of this action as Exhibit A.
2. The parties agree that the amount in controversy does not exceed \$74,999.00, which effectively renders this Court without subject matter jurisdiction.
3. Plaintiff has agreed to withdraw her motion for imposition of attorney's fees currently pending before this Honorable Court.

Respectfully submitted this 23rd day June, 2006.

/s/ Joseph T. Carpenter
JOSEPH T. CARPENTER
Attorney for Liberty Mutual Fire Insurance Co.

OF COUNSEL:

Carpenter, Ingram & Mosholder, LLP
303 Sterling Centre
4121 Carmichael Road
Montgomery, AL 36106
Telephone: (334) 213-5600

/s/ Christina D. Crow
CHRISTINA D. CROW
Attorney for Denness R. Ellis

OF COUNSEL:

Jinks, Daniel & Crow, P. C.
P. O. Box 330
Union Springs, AL 36089
Telephone: (334) 738-4225